

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>08-224</u>
v.	:	DATE FILED: <u>4/22/08</u>
SHAUN DAVIS	:	VIOLATION:
	:	18 U.S.C. § 1001(a)(2) (false statements - 2
	:	counts)
	:	18 U.S.C. § 1028A(a)(1) (aggravated
	:	identity theft - 2 counts)
		Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about May 23, 2007, in the Eastern District of Pennsylvania,
defendant

SHAUN DAVIS,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant DAVIS advised the Federal Bureau of Investigation that he was LaVance Davis, and signed documents identifying himself as LaVance Davis in order to certify the seizure of certain property, when as the defendant knew he was providing false identification and falsely swearing to his identification.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2007, in the Eastern District of Pennsylvania,
defendant

SHAUN DAVIS,

in a matter within the jurisdiction of the Federal Bureau of Investigation, an agency of the executive branch of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations in that defendant DAVIS advised the Federal Bureau of Investigation that he was LaVance Davis, and signed documents identifying himself as LaVance Davis in order to have previously seized property returned to him, when as the defendant knew he was providing false identification and falsely swearing to his identification.

In violation of Title 18, United States Code, Section 1001(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 23, 2007, in the Eastern District of Pennsylvania,
defendant

SHAUN DAVIS

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name and other means of identification of LaVance Davis, during and in relation to his making false statements to agent of the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 24, 2007, in the Eastern District of Pennsylvania,
defendant

SHAUN DAVIS

knowingly and without lawful authority possessed and used a means of identification of another person, that is, the name and other means of identification of LaVance Davis, during and in relation to his making false statements to agent of the Federal Bureau of Investigation.

In violation of Title 18, United States Code, Section 1028A(a)(1).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1001(a)(2), set forth in this indictment, defendant

SHAUN DAVIS

shall forfeit to the United States of America any and all property, real or personal, which represents or is traceable to the gross receipts obtained, directly or indirectly, as a result of such offense, including, but not limited to, the sum of \$2,130.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b),

incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(3), (a)(4) and (b).

A TRUE BILL:

GRAND JURY FOREPERSON

PATRICK L. MEEHAN
United States Attorney